

General Complaint

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS

Brian Sanders

Case Number : 5:21cv00093

\_\_\_\_\_  
List the full name of each plaintiff in this action.

VS.

Texas A&M University-Texarkana

\_\_\_\_\_  
List the full name of each defendant in this action.  
Do not use "et al".

Attach additional pages if necessary.

I. ATTEMPT TO SECURE COUNSEL:

Please answer the following concerning your attempt to secure counsel.

A. In the preparation of this suit, I have attempted to secure the aid of an attorney as follows: (circle one)

1. Employ Counsel
2. Court - Appointed Counsel
3. Lawyer Referral Service of the State Bar of Texas,  
P. O. Box 12487, Austin, Texas 78711.

B. List the name(s) and address(es) of the attorney(s):

Bess Masterson-3109 Carlisle St. Dallas, TX 75204

Wade Forsman-P.O. Box 918 Sulphur Springs, TX 75483

C. Results of the conference with counsel:

Mr. Forsman reviewed my documentation and said he couldn't take my case as he was  
already stretched too thin. Ms. Masterson stated that they reviewed the facts of my case  
but unfortunately they are unable to help.

II. List previous lawsuits:

A. Have you filed other lawsuits in state or federal court dealing with the same facts  
involved in this action or any other incidents? \_\_\_\_\_ Yes ☒ No

B. If your answer to "A" is "yes", describe the lawsuit in the space below.  
If there is more than one lawsuit, attach a separate piece of paper describing  
each.

1. Approximate file date of lawsuit: \_\_\_\_\_

2. Parties to previous lawsuit(s):

Plaintiff \_\_\_\_\_

Defendant \_\_\_\_\_

Attach a separate piece of paper for additional plaintiffs or defendants.

3. Identify the court the lawsuit was filed. If federal, name the district. If  
state, name the county.

\_\_\_\_\_

4. Docket number in other court. \_\_\_\_\_

5. Name of judge to whom the case was assigned.

\_\_\_\_\_

6. Disposition: Was the case dismissed, appealed or still pending?

\_\_\_\_\_

7. Approximate date of disposition. \_\_\_\_\_

III. Parties to this suit:

A. List the full name and address of each plaintiff:

Pla #1 Brian Sanders-8616 Nancy Pl. Little Rock, AR 72204

\_\_\_\_\_

\_\_\_\_\_

Pla #2 \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

B. List the full name of each defendant, their official position, place of employment and full mailing address.

Dft #1: Texas A&M University-Texarkana-7101 University Texarkana, TX  
75503

\_\_\_\_\_

\_\_\_\_\_

Dft #2: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Dft #3 \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Attach a separate sheet for additional parties.

IV: Statement of Claim:

State as briefly as possible the fact of your case. Describe how each defendant is involved. Include the names of other persons involved with dates and places. Do not give any legal arguments or cite cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need, attaching additional pages if necessary.

Texas A&M University-Texarkana refused to consider my application  
for employment on 12/10/2014 due to my disability. Texas A&M  
University-Texarkana would not consider my application complete  
because I did not possess a driver's license. Due to my total blindness,  
I am unable to obtain a driver's license. I spoke with Mr. Norton's assistant  
at the time about my situation and she laughed at the possibility of me  
being considered as Recruitment Specialist. I spoke with Mr. Norton  
about my situation and requested that my application still be considered  
without completing the driver's license portion. I explained to him about  
the reasonable accommodation that had allowed me to travel in my previous  
jobs and how I still had those resources available to perform all  
essential job duties of a recruitment specialist. He refused to allow my  
application to move forward and would not consider any reasonable  
accommodations for me.

- V. Relief: State Briefly exactly what you want the court to do for you. Make no legal arguments and do not cite cases or statutes. Attach additional pages if necessary.

As a direct and proximate result of the defendant's conduct as described  
herein, I have been severely damaged in that(among other things) I have  
experienced and will continue to experience pecuniary losses (including  
lost pay and benefits), lost earning capacity, mental anguish and emotional  
distress as manifested by a variety of objective physical and emotional  
symptoms, and the loss of life's enjoyment. I am seeking restitution  
for these damages and that the defendant be forced to receive ADA training.

Signed this 28th day of July, 20 21.  
(Month) (Year)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I declare (certify, verify or state) under penalty of perjury that the foregoing is true and correct.

Executed on: 07/28/2021

Date

*R. S.*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature of each plaintiff

UNITED STATES DISTRICT COURTS  
EASTERN DISTRICT OF TEXAS  
\_\_\_\_\_ DIVISION

Brian Sanders  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Case Number: \_\_\_\_\_

\_\_\_\_\_  
Name of Plaintiff(s)

vs

Texas A&M University-Texarkana  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Name of Defendant(s)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

Note: If plaintiff is alleging employment discrimination based on race or color, please also see 42:U.S.C. 1981

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the court by 42 U.S.C. 2000e-5. Equitable and other relief are also sought under 42 U.S.C. 2000e-5(g).

- 2.. Plaintiff, Brian Sanders, is a citizen of the United States  
(name of plaintiff)

and resides at 8616 Nancy Pl, Little Rock, \_\_\_\_\_,  
(street address) (city)

Pulaski, AR, 72204, 903-306-8616.  
(county) (state) (zip) (telephone)

- 3.. Defendant, Texas A&M University-Texarkana, resides at, or its business is  
(name of defendant)  
located at 7101 University, Texarkana,  
(street address) (city)  
Bowie, TX, 75503, 903-223-3000.  
(county) (state) (zip) (telephone)
4. Plaintiff sought employment from the defendant or was employed by the defendant  
at 7101 University, Texarkana,  
(street address) (city)  
Bowie, TX, 75503.  
(county) (state) (zip)
5. Defendant discriminated against plaintiff in the manner indicated in paragraphs 9 and 10  
of the complaint on or about 12/10/2014.  
(month, day, year)
6. Plaintiff filed charges against the defendant with the Equal Employment Opportunity  
Commission charging defendant with the acts of discrimination indicated in paragraphs  
9 and 10 of this complaint on or about 12/15/2014.  
(month, day, year)
7. The Equal Employment Commission issued a Notice of Right to Sue which was  
received by plaintiff on 4/30/2021.  
(month day, year)

8. Because of plaintiff's (1) \_\_\_\_\_ race, (2) \_\_\_\_\_ color, (3) \_\_\_\_\_ sex,  
(4) \_\_\_\_\_ national origin, defendant:

- a. \_\_\_\_\_ failed to employ plaintiff.
- b. \_\_\_\_\_ terminated plaintiff's employment.
- c. \_\_\_\_\_ failed to promote plaintiff.
- d. ☒ Other refused to consider application for employment due to  
disability.

9. The circumstances under which the defendant discriminated against plaintiff were as follows:

Texas A&M University-Texarkana would not consider my application complete because  
I did not possess a driver's license. Due to total blindness, I'm unable to obtain a driver's  
license. I spoke with Mr, Norton's assistant at the time about my situation and she laughed  
at the possibility of me being considered as Recruitment Specialist. I spoke with Mr. Norton  
about my situation and requested that my application still be considered without completing  
the driver's license portion. I explained to him about the reasonable accommodations that  
had allowed me to travel in my previous jobs and how I still had those resources available  
to perform all essential job duties of a recruitment specialist. He refused to allow my  
application to move forward and would not consider any reasonable accommodations for  
me.



10. The acts set forth in paragraph 9 of this complaint:
- a. \_\_\_\_\_ are still being committed by defendant.
  - b. \_\_\_\_\_ are no longer being committed by defendant.
  - c.   X   defendant may still be committing the acts.
11. Plaintiff attaches to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission which charges are submitted as a brief statement of the facts supporting this complaint. WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:
- a. \_\_\_\_\_ Defendant be directed to employ plaintiff.
  - b. \_\_\_\_\_ Defendant be directed to re-employ plaintiff.
  - c. \_\_\_\_\_ Defendant be directed to promote plaintiff.
  - d.   X   Defendant be directed to receive ADA training and that the
- Court grant such relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.



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(Signature of Plaintiff)